

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

FILED

2016 JUL 20 AM 11:21

UNITED STATES OF AMERICA

*Plaintiff,*

V.

SINA MOGHTADER,

*Defendant.*

**SA 16 CR 05 16**

§ CRIMINAL NO.:

§

§

§

§

§

§

§

§

§

§

§

§

INDICTMENT

[Violation: Counts 1 and 2, Influencing a Federal Official by Threat, 18 U.S.C. §§ 115(a)(1)(B) and 115(b)(4); Counts 3 and 4, Influencing a Federal Official by Threat, 18 U.S.C. §§ 115(a)(1)(A) and 115(b)(4); Counts 5 and 6, Cyberstalking, 18 U.S.C. § 2261A(2)]

**DAE**

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 115(a)(1)(B) and 115(b)(4)]

Beginning on or about May 26, 2016, and continuing through on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

did threaten to murder N.S., an attorney for the United States Department of Justice, with intent to intimidate N.S. while she was engaged in the performance of her official duties, and to retaliate against N.S. on account of the performance of her official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

**COUNT TWO**

[18 U.S.C. §115(a)(1)(B) and 115(b)(4)]

Beginning on or about May 26, 2016, and continuing through on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

did threaten to murder K.W., an attorney for the United States Department of Justice, with intent to intimidate K.W. while she was engaged in the performance of her official duties, and to retaliate against K.W. on account of the performance of her official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

**COUNT THREE**

[18 U.S.C. §115(a)(1)(A) and 115(b)(4)]

Beginning on or about May 26, 2016, and continuing through on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

did threaten to murder the children of N.S., an attorney for the United States Department of Justice, with intent to intimidate N.S. while she was engaged in the performance of her official duties, and to retaliate against N.S. on account of the performance of her official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(A) and 115(b)(4).

**COUNT FOUR**

[18 U.S.C. §115(a)(1)(A) and 115(b)(4)]

Beginning on or about May 26, 2016, and continuing through on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

did threaten to murder the children of K.W., an attorney for the United States Department of Justice, with intent to intimidate K.W. while she was engaged in the performance of her official duties, and to retaliate against K.W. on account of the performance of her official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(A) and 115(b)(4).

**COUNT FIVE**  
[18 U.S.C. §2261A(2)]

From on or about May 26, 2016, until on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

with the intent to cause substantial emotional distress to a person in another state, namely, Washington, D.C., used facilities of interstate or foreign commerce, including electronic mail, to engage in a course of conduct that caused substantial emotion distress to N.S., and placed her in reasonable fear of death or serious bodily.

**COUNT SIX**  
[18 U.S.C. §2261A(2)]

From on or about May 26, 2016, until on or about June 22, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**SINA MOGHTADER,**

with the intent to cause substantial emotional distress to a person in another state, namely, Washington, D.C., used facilities of interstate or foreign commerce, including electronic mail, to

engage in a course of conduct that caused substantial emotion distress to K.W., and placed her in reasonable fear of death or serious bodily.

A TRUE BILL

GRAND JURY FOREPERSON

RICHARD L. DURBIN, JR.  
United States Attorney

By:

  
BETTINA J. RICHARDSON  
Assistant United States Attorney